

To: Pruitt, Scott[Pruitt.Scott@epa.gov]
From: Jane G Witheridge
Sent: Mon 2/20/2017 4:55:47 AM
Subject: Office of Land and Emergency Management - Offer to Support EPA

Dear Administrator Pruitt,

Congratulations on your confirmation. I have written you before, and promise to take a break after this contact.

Your interview in the Wall St. Journal – which was great - and the recently introduced bill to abolish the EPA got me thinking about your agency and its structure, specifically the Office of Land and Emergency Management (OLEM). I have over 30 years' experience in the environmental industry – from a grunt staff engineer to the VP of Strategic Planning for a \$10B publicly traded company to business owner - and below is my brief opinion of the offices that sit within OLEM. I offer this because I want to help your agency improve its focus and traction. I understand that with the exception perhaps of Superfund, OLEM is not one of your highest priorities. Nonetheless, the issues raised below would be worthwhile to address because, simply said, a more efficient OLEM would better serve the people.

•**Office of Superfund Remediation and Technology Innovation:** This office was a benefit when CERCLA was enacted because it helped to organize facilities by their potential threat to human health and the environment, and it provided a valuable framework under which a site should be remediated. That said, less than 15 sites have been proposed for listing in the last ten years, and as you indicated to the WSJ, there are facilities that have not been cleaned up in over 30 years. Setting aside the issue of funding, state agencies and contractors can readily conduct and monitor the cleanup work. Perhaps the goal of this office should be to sunset within a specific timeframe. I have experience in managing cleanups and aligning environmental staffs with business objectives, and would be happy to help drive EPA's efforts with a sense of urgency to complete the jobs it started.

•**Office of Office of Resource Conservation and Recovery (RCRA):** I've worked on waste projects in over 40 states, and have found state agencies to do a good job managing their commercial and municipal waste. My understanding is that there is not a single RCRA designed and operated landfill site that has created a significant impact to human health or the environment, and thus, I do not believe EPA has much value to add to the states regarding these waste streams. One area where EPA's guidance could be helpful is the management of large waste volumes such as those generated by the energy industry, including coal ash and energy streams with low levels of radioactive materials, and water treatment facilities. A national standard for some of these wastes could even the playing field, and enable transport of

radioactive materials across state borders without the limitations now unnecessarily imposed by some compacts. Over the last five years I have focused almost exclusively on the safe management of exploration and production oil and gas waste streams. It would delight me to help EPA develop practical guidance to states for the efficacious management of energy related wastes, while supporting your agency's response to the DC's District Court consent decree (*Envtl. Integrity Project v. McCarthy*, No. 1:16-CV-00842-JDB D.D.C. filed Dec. 28, 2016).

- **Office of Underground Storage Tanks:** Because state agencies provide environmental protection for facilities which have much greater potential to pollute than the discrete source of an underground tank, my initial reaction is that states therefore should be able to manage their own UST programs without a lot of oversight from EPA. It would be good to understand the value add EPA brings to this program, and whether or not the program should be tucked in under the RCRA office. I would be happy to assess the value of EPA continuing this program as is and/or rolling more of the oversight out to the states.

- **Office of Brownfields and Land Revitalization:** Query – why is the EPA involved in land revitalization? Once property is cleaned to a certain standard, it would seem that this is a matter for a state or local authority rather than the federal government. I would be pleased to dig in and evaluate what EPA support, if any, is within the purview of the agency and whether or not some of these projects might be better handled by another jurisdiction.

- **Office of Emergency Management:** For significant disasters, a federal role is likely to be very helpful, though I would ask about the benefits of this falling under EPA versus another group such as the Department of Homeland Security, the Army Corps of Engineers, or the military.

- **Federal Facilities Restoration:** I am not familiar with this program, however, it would appear that the same effort deployed to close out programs under CERCLA/SARA would be of benefit here.

I have performed structured cost benefit analyses of environmental services, organizational evaluations for large publicly traded and small companies alike, as well as successfully implemented organizational changes. I am not a lawyer, but come to you with an MBA from the University of Chicago and an undergraduate degree from Lafayette College where I majored in engineering.

If you have any interest, please know that I am completely flexible as to the location and structure under which my services would be employed.

Best wishes.

j

Jane G. Witheridge

Batavia IL 60510

Ex. 6 - Personal Privacy